

WHEREAS, *the DOF's Guidelines further specify that "up to 25 percent of the revenue generated from the sale of forest products on State Forests is returned to the State Forest system for the enhancement of the overall forest environment, including recreation, wildlife resources, conservation, education, forest fire prevention, and watershed protection; and*

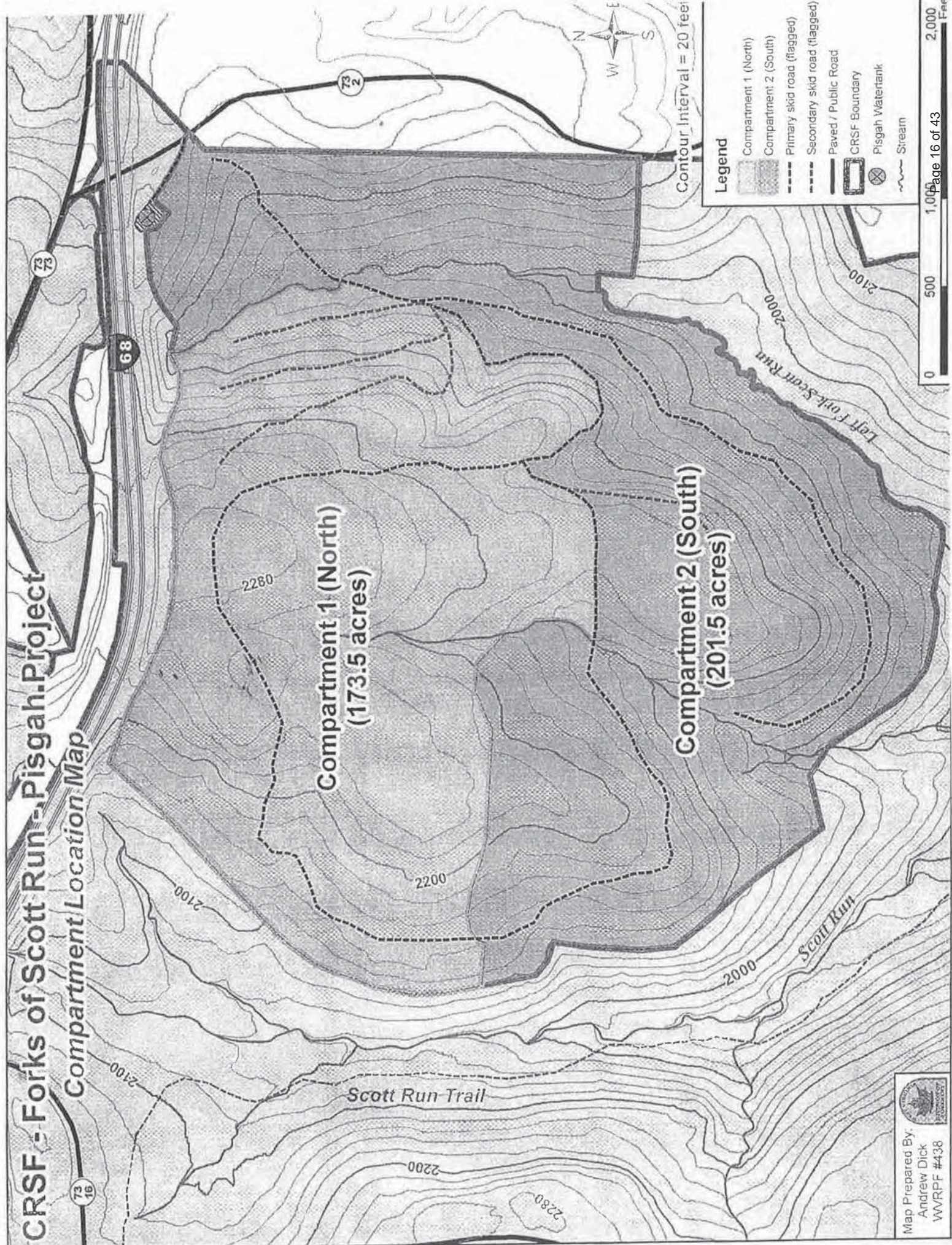
WHEREAS, *the FSRP Project includes no documented plan for the reinvestment on Coopers Rock State Forest of up to 25 percent of the revenue generated from the sale of forest products; and*

WHEREAS, *several of the facilities at Coopers Rock State Forest are in severe decline, including the only restroom that is available for free to the public and which is closed to the public during the winter months; and*

WHEREAS, *the Morgantown community would benefit greatly from dedicated, official recreational trails within the FSRP Project, from the re-investment of revenue generated by the Project into upgrading facilities such as the addition of a new restroom, and from the inclusion of public comments into the FSRP development plan; and*

NOW, THEREFORE, *be it resolved on this _____ day of October, 2014, that Morgantown City Council asks that the West Virginia Division of Forestry revise its Forks of Scott Run-Pisgah Project in order to develop a credible recreation plan by working with recreational experts, local residents, the Coopers Rock State Forest Recreational Advisory Committee, and local organizations such as the Coopers Rock Foundation.*

CRSF - Forks of Scott Run - Pisgah Project Compartment Location Map



Compartment 1 (North)
 (173.5 acres)

Compartment 2 (South)
 (201.5 acres)

Legend

- Compartment 1 (North)
- Compartment 2 (South)
- Primary skid road (flagged)
- Secondary skid road (flagged)
- Paved / Public Road
- CRSF Boundary
- Pisgah Watertank
- Stream

Contour Interval = 20 feet

Map Prepared By:
 Andrew Dick
 WRP/PF #438

0 500 1,000 2,000 Feet

Mark L. McKoy
1217 Laurel Run Road
Bruceton Mills, WV 26525

Sep. 2, 2014

Ms. Barbara A. Breshock
State Lands Manager
330 Harper Park Drive, Suite J
Beckley, WV 25801

Dear Ms. Breshock,

I hereby submit comments on the recently issued "Coopers Rock State Forest, Forks of Scott Run – Pisgah Project, Silvicultural Prescription & Overview for Multiple Use Management."

The Coopers Rock State Forest is the most frequently visited State Forest in West Virginia. It is used by both in-state and out-of-state visitors and is recognized as a valuable economic asset of the State and of the Morgantown region. It is a recreational area that makes the Morgantown region more attractive as a place to live or visit. Because this State Forest serves the purposes of a State Park, it should be treated as such. To this end, I strongly encourage the West Virginia Division of Forestry (WVDoF) to seek public input on this issue and all significant issues surrounding this State Forest.

The *Guidelines for Managing West Virginia's Nine State Forest* (2013) acknowledges that State Forests are to serve multiple purposes but also that "it is difficult to achieve an optimum mix of uses by managing every acre on every forest for every use. Optimum use can better be achieved by providing the full range of multiple uses over the entire State Forest system while setting aside unique areas (perhaps for a single use)." This guidance allows for recognition of the role of Coopers Rock State Forest among all of the State's Forests and the role it plays in State and local tourism and recreation. More to the point, this guidance compels WVDoF to recognize Coopers Rock State Forest for its roles and to further cultivate this Forest for its highest values. Such recognition, and further cultivation, would dictate that logging be done either in small clear cuts (generally much less than 100 acres) and/or in selective tree harvesting while leaving most of the forest intact. The value of this particular State Forest -- direct and indirect, tangible and intangible -- should be given full weight and balanced against the purported benefit of logging at the scale proposed, before deciding to go forward with the current prescription. Generally, people do not engage in recreational activities and tourism in large clear-cut areas or in heavily logged areas. Therefore, I most strongly encourage WVDoF to reconsider its plans for larger-scale logging operations and to adopt plans more consistent with the values and best uses of the Coopers Rock State Forest.

The management in the Coopers Rock State Forest south of I-68 should be considered in the regional context, especially regarding forest activities in Coopers Rock State Forest on the north side of I-68 (a.k.a. "WVU Forest"). There is on-going and relatively extensive logging in the State Forest north of I-68. This includes a recent clear-cut directly across I-68 and Route 73 from the currently proposed

prescription. Given this, bird species that prefer emergent or new succession vegetation would not gain much benefit from the proposed prescription. Along Chestnut Ridge, there are areas of logging and early succession forest such that the proposed prescription does not add to regional habitat diversity and biodiversity.

On the other end of the spectrum of forest succession habitats, there is scarcely any virgin forest and little old growth forest to support species that benefit from or require this type of habitat. The Guidelines state that currently 8 percent of the 63,000 acres of State Forests are old growth and/or mature forests. The Guidelines note that these areas are mostly in protected riparian areas and buffer areas. This means that there are no large blocks of this forest type. There are species of wildlife that benefit from or require old growth forest. I have attached photographs of one such species, the Northern subspecies of Pileated Woodpeckers, which benefit greatly from old growth forests. The attached photos show Northern subspecies Pileated Woodpeckers on a wood pile at the edge of my yard and about 250 feet from the Coopers Rock State Forest on the north side of I-68. I have had very few sightings of these large birds during the 13 years that I have owned property here. I spend significant amounts of time bird watching and photographing birds, and I can attest to the rare occurrence of these Northern subspecies Pileated Woodpeckers in this area (Please note that the bird counts are mostly based on bird sounds and are not reliable or useful for distinguishing the various species of woodpeckers, much less the subspecies and varieties).

Furthermore, logging on State land seems to reduce the demand for timber from private holdings and reduce the prices that private land owners, like me, can get for trees. Logging on State lands has an adverse economic impact on me.

WVDoF should give strong consideration to restoration of original forests to at least some areas. I have read that Chestnut Ridge had forest dominated by Beech and Chestnut trees at the time of the first European settlements. Whether true or not, Coopers Rock State Forest would be an ideal place to plant a small area with blight-resistant chestnut trees. Perhaps the WVDoF's own nursery stocks could supply a small planting effort. This effort should include other species of trees with the goal of recreating the dominant native forest within a small area. This would more appropriately fulfill the research and demonstration goals as stated within the Guidelines.

I noticed that the Guidelines (p. 11) prohibit "clear cutting" in State Forests. Although currently proposed activities are not described as "clear cutting" in the prescription, most logging during recent years would be best described as "clear cutting". Again, I urge WVDoF to change its prescription to permit 90 percent-plus harvesting only in small areas (preferably smaller than 20 acres) and selective harvesting of less than 30 percent of the trees larger than 6-inches DBH elsewhere.

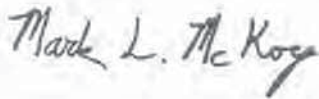
A few other points should be addressed:

- Revenue from timber sales probably does not cover all the costs directly incurred by the State before, during and after the logging event. This information is not readily available to the public but should be.

- WVDoF should publish detailed responses to comments submitted during the previous (and every) comment period on the timber sale. Failure to do so raises questions about whether WVDoF has seriously considered and attempted to address comments submitted by the public. It also raises questions about whether WVDoF is truly working in the best interest of the public or whether it is working in the best interest of certain industry-connected groups.
- The prescription lauds multiple benefits of the proposed logging but makes almost no mention of potential adverse impacts or dismisses such impacts by stating that best management practices (BMPs) would be used to mitigate impacts. Balanced, objective and fair descriptions of the benefits and impacts should be presented in forest management prescriptions. Mitigation measures, along with the enforcement mechanisms, should be described so that readers know what is proposed and what is likely to happen.
- All prescriptions for timbering activities should be consistent with an overarching plan for management of Coopers Rock State Forest. The current prescription fails to mention any such plan from which the current proposal is tiered. The current prescription should appropriately tier from the 2006 Forest Resources Management Plan.
- In one place the draft prescription mentions a "1996 WVDOF CRSF Timber Resources Management plan". If this plan is the intended reference, it should be linked into the webpage where the current draft prescription is posted.

For the reasons stated above, I request the WVDoF to reconsider and change the currently proposed prescription and then re-issue the revised prescription for public review and comment.

Sincerely,



Mark L. McKoy
Environmental Manager & Geologist, local resident





Northern Pileated Woodpecker (*Dryocopus pileatus abieticola* {Northern Subspecies}) eating carpenter ants on a pile of decaying wood. The northern subspecies is substantially larger than the southern subspecies. They are not common in this region. Photos by Mark L. McKoy, taken 2012.